



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

MAY 29 1998

REPLY TO THE ATTENTION OF:

AE-17J

VIA FACSIMILE AND U.S. MAIL

David L. Beil, P.E.
Staff Engineer, Permits Unit
Regulatory Compliance Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155-398

Re: Metropolitan Wastewater Treatment Plant

Dear Mr. Beil:

Provided below are suggestions for the Metropolitan Council's Compliance Schedule for the multi-hearth sludge incinerators at the Metropolitan Wastewater Treatment Plant in St. Paul, Minnesota:

Add to Corrective Action:

"Submit a plan, due 30 days after the effective date of the Permit, for MPCA approval, which describes in detail a new design for seals on all bypass dampers. The new seal design shall be designed to eliminate air emission leakage through the dampers to the emergency stacks. This design will become an enforceable part of this Permit upon approval by MPCA. Upon design approval by MPCA, the Metropolitan Council shall construct and install new seals as approved by MPCA.

Submit a plan, due 30 days after the effective date of the Permit, for MPCA approval, which describes in detail the steps to be implemented by the Metropolitan Council to curtail bypasses to the emergency stacks. This plan will become an enforceable part of this Permit upon approval by MPCA. The Metropolitan Council shall implement the plan as approved by MPCA. The plan shall address, but is not limited to, elimination of emergency damper leakage, reduction of water content in sludge feed, elimination of in-leakage throughout the air pollution control train, repair or upgrading components of the air pollution control train, reduction of ID fan breakdowns, an assessment of scrubber water flow problems, determination of locations of high pressure drops

in the air pollution control system, and human error as a cause of bypass events. Upon plan approval by MPCA, the Metropolitan Council shall implement the plan as approved by MPCA."

Additional Suggestion:

Delete items 4 and 6 upon confirmation from Metropolitan Council that ceramic fiber seats have been installed on all bypass dampers and that diversion of shaft cooling air from all bypass stacks have been completed.

If you have any questions, feel free to contact me at (312) 886-6797.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'Lynn Kuo', with a long horizontal flourish extending to the right.

Lynn Kuo
Air Enforcement and Compliance
Assurance Branch (OH/MN)

standard bcc's: official file copy
 originating organization reading file

other bcc's: McAuliffe, Mary (Office of Regional Counsel)
 Lofton, Jim (Department of Justice)

ARD:AECAB:AECAS (MN/OH):lkuo:5/29/98

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